



April 24, 2023

Via ECF and E-mail

Hon. Katherine Polk Failla United States District Court Southern District of New York 40 Foley Square, Room 2103 New York, NY 10007

Re: In re Tether and Bitfinex Crypto Asset Litigation, 19-CV-09236 (KPF) – Letter Motion to File Redacted Exhibits Under Seal

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file Plaintiffs' April 24 Letter Motion to the Court ("<u>Plaintiffs' Letter Motion</u>") in redacted form and Exhibits 1-9, 12-21, and 23 to that motion under seal.

The redacted information in Plaintiffs' Letter Motion and Exhibits 1-9, 12-21, and 23 contain information that has been designated as Confidential or Attorneys' Eyes Only by Defendants pursuant to this Court's Protective Order. ECF No. 151, at ¶ 3. Plaintiffs do not object to the characterization of these exhibits and related redacted information as Confidential or Attorneys' Eyes Only for the limited purposes of this filing.

Accordingly, Plaintiffs respectfully request leave to file Plaintiffs' Letter Motion in redacted form and Exhibits 1-9, 12-21, and 23 under seal to avoid any improper disclosure of information Defendants have designated as Confidential or Attorneys' Eyes Only. *See* ECF No. 151, at \P 4.b.

Hon. Katherine Polk Failla April 24, 2023

Respectfully submitted,

/s/ Andrew R. Dunlap

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cc: All Counsel of Record (via ECF)